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February 15, 2005

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Federal Communications Commission
Office of Secretary

Marlene H. Dortch, Esquire
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554
Attention: Audio Division

Re: **Reply Comments**
MB Docket No. 02-295
RM-10580

Dear Ms. Dortch:

Transmitted herewith, on behalf of Blakeney Communications, Inc., are an original and four copies of its Reply Comments in the above-captioned proceeding.

Should any questions arise concerning this matter, please contact this office.

Very truly yours,

FLETCHER, HEALD & HILDRETH, P.L.C.


Frank R. Jazzo
Counsel for Blakeney Communications, Inc.

Enclosures

cc: Service List (w/enc.)

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FEB 15 2005

Federal Communications Commission
Office of Secretary

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Section 73.202(b))	MB Docket No. 02-295
Table of Allotments)	RM-10580
FM Broadcast Stations)	
(Gonzales, Houma and Westwego, Louisiana)	
and Hattiesburg, Mississippi)	

To: Chief, Audio Division
Media Bureau

REPLY COMMENTS

Blakeney Communications, Inc. ("Blakeney")¹ hereby offers its reply comments in the above-captioned proceeding before the Commission because of a compelling public interest factor that should be considered in the final analysis of the proposal by Clear Channel Communications and the counterproposal offered by Guaranty Broadcasting Company, LLC and its affiliate, Guaranty Broadcasting Company of Baton Rouge, LLC (collectively, "Guaranty").

Blakeney opposes the counterproposal by Guaranty to relocate WYPY from Baton Rouge to Gonzales, Louisiana, and supports the original proposal by Clear Channel to downgrade WUSW to Class C0 and change its city of license from Hattiesburg, Mississippi, to Westwego, Louisiana, and to downgrade Channel 281C to a Class C0 and change its allotted city of license from Houma, Louisiana, to Gonzales, Louisiana.

¹ Blakeney Communications, Inc. is the licensee of WBBN(FM), Taylorsville, Mississippi (Fac. ID #71207); WXRR(FM), Hattiesburg, Mississippi (Fac. ID #29549); WKZW(FM), Sandersville, Mississippi (Fac. ID #14021); and WXHB(FM), Richton, Mississippi (Fac. ID #70409).

The original Clear Channel proposal not only results in a preferential arrangement of allotments that better serves the public interest in general, it also alleviates an unfair competitive advantage that Clear Channel enjoys in the Laurel-Hattiesburg, Mississippi, radio market.

Under the Commission's current radio ownership rules which rely on the number of radio stations in an Arbitron Radio Metro market to determine the number of stations a licensee may own in a given market, Clear Channel should be allowed to own no more than four (4) FM radio stations in the Laurel-Hattiesburg market. However, because Clear Channel's Laurel-Hattiesburg cluster of five (5) FM stations was created under the previous Contour Overlap Method of defining radio markets (over the strong objections of Blakeney Communications, Inc. when the cluster was originally created by Cumulus), this unfair competitive advantage that would now be illegal under the new radio ownership limits has been "grandfathered" and allowed to stand by the Commission.

Clear Channel stations WUSW(FM), WNSL(FM), WJKX(FM) and WHER(FM) are all high power, wide coverage area FM stations. Only Clear Channel's WZLD(FM) is a Class A, but even it has a Construction Permit to upgrade to Class C2 (BPH-20030418ABH).

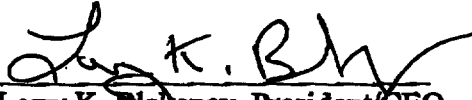
The latest Arbitron Condensed Radio Market Report, Fall 2004, demonstrates the monopolistic stranglehold that Clear Channel has on the Laurel-Hattiesburg market with its grandfathered cluster of five FM stations. The Clear Channel FMs ranked #2, #3, #4, #5 and #6 in persons 12+ in the latest survey. That is five of the top six stations for a combined market share of 40.0 in persons 12+.

We believe that relocating WUSW(FM) from Hattiesburg, Mississippi, to Westwego, Louisiana, as that community's first local service and relocating Channel 281C from Houma,

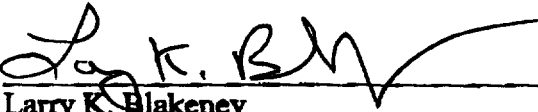
Louisiana, as that community's first local service and relocating Channel 281C from Houma, Louisiana, to Gonzales, Louisiana, as that community's first local service, will also allow the Commission to alleviate a Clear Channel competitive advantage in Laurel-Hattiesburg, Mississippi, that is not only unfair but would be considered illegal under today's rules. Relocating WUSW(FM) from Hattiesburg, Mississippi, to Westwego, Louisiana, will bring Clear Channel's station total (no more than four in one class) in Laurel-Hattiesburg, Mississippi, within the Commission's current ownership limit based on the Arbitron Radio Metro method of defining radio markets.

This will not only result in a more level playing field for the other licensees, virtually all of which are small, local area broadcasters; but it will also provide local advertisers and the listening public with a more competitive Laurel-Hattiesburg radio market. We believe this greatly serves fairness and the public interest.

Respectfully submitted,


Larry K. Blakeney, President/CEO
Blakeney Communications, Inc.

I, Larry K. Blakeney, President/CEO of Blakeney Communications, Inc., verify under penalty of perjury that the foregoing Reply Comments are true and correct. Executed on February 15, 2005.


Larry K. Blakeney
P.O. Box 6408
Laurel, Mississippi 39441

February 15, 2005

CERTIFICATE OF SERVICE

I, Barbara Lyle, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., do hereby certify that a copy of the foregoing "Reply Comments" was sent this 15th day of February, 2005, by first-class United States Mail, postage prepaid to:

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Barbara L. Lyle

*By Hand Delivery